



Asociación Internacional de Transporte Aéreo Latinoamericano

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AI-C-1046

DOCKET SECTION

Bogotá, February 19, 1991

Docket Clerk
U.S. Department of Transportation
Room 4107, Docket No. 47381
400 7th Street, S.W.
Washington, D.C. 20590

Gentlemen,

AITAL (Asociación Internacional de Transporte Aéreo Latinoamericano) is a non-profit corporation which represents the interests of Latin American international common carriers. AITAL is currently comprised of 25 companies whose names are printed on the left bottom margin of this paper and which serve most of the Latin American international traffic.

We have taken due note of your NPRM (Docket No. 47383; Notice 91-2) published in the Federal Register of January 31, 1991, in which comments are requested about "Aviation Security: Passenger Manifest Information", and specifically on the part "Domestic/Foreign" that could affect the interests of AITAL member companies operating to the United States.

Generally speaking, we call in question the convenience that Latin American carriers be obliged to send to the State Department of the United States a passenger manifest including full names, passport numbers, address and telephone contact of the passenger in the U.S., as would be required from U.S. airlines, in the event of a "disaster" related to terrorist acts directed at a specific flight, information that must be forwarded within one hour. We do not see a direct relation between the convenience of advising relatives or contacts that a passenger could have in the U.S. and the heavy additional workload that would be imposed upon the carriers. In fact, it would be more logical to provide this data in the country of origin of the passenger and not in his destination within the U.S. For example, being most of the passengers tourists, what use would it be to advise such a "disaster" to the hotel that the passenger is supposedly going to be staying at? Likewise, what would happen with passengers just in transit towards other countries?

On the other hand, we do not believe that this data could be of great use for intelligence investigations on terrorist sources. Most of the times, terrorist acts are carried out for political reasons and they are usually claimed by the performers as a way of proving their intimidating power. It would then be more appropriate to establish contacts between the various government intelligence agencies.

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Aeroperb
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Avensa
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Aviateca
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Ecuatoriana de Aviación
Lacsa

La Jile
Líneas Aéreas Paraguayas
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Carriers would have to pass most of this burden on to travel agencies and in Latin American not all sales are done through agents, and also, it would be very difficult to compulsorily compel them to comply with these requirements. In addition, few airlines in the region have automated their agencies. All this would force airlines to keep this control at check-in time which would lead to even more delays. Now, passengers are obliged to show up at the airport at least two hours in advance because both passengers and luggage are subjected to thorough security and narcotics searches, immigration proceedings, in addition to having to pay taxes, etc.

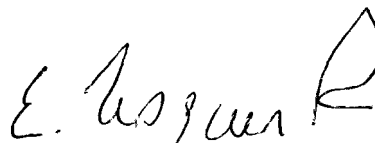
In practice, the only solution would be to distribute to passengers already at the airport, a special form to be verified during the check-in procedure, without the airline being able to fully guarantee the truthfulness of, let us say, the address or telephone in the U.S. Many companies do not have automated check-in, so the data would have to be filed until the flight arrives in the U.S.; but in the event of a disaster there would also be difficulties for the prompt transmission, since communications to destination points in the U.S. are not always automated, or if they are, the case may be that the software is not compatible with the State Department software.

We hope that these comments can be of use at the time of making a decision in connection with foreign carriers.

Please acknowledge receipt of this letter and advise us of your final decision to fax No. (571)413-9178.

Since the deadline for submitting comments expires today, this letter has been sent via fax but it will get to you in triplicate by air mail.

Sincerely yours,


Ernesto Vásquez Rocha
Executive Director